

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

G.G., A.L., and B.S., individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

VALVE CORPORATION, a Washington corporation,

Defendant.

NO. 2:16-CV-01941 JCC

PLAINTIFFS' MOTION TO SEAL

NOTE ON MOTION CALENDAR: 2/19/19

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(g), Plaintiffs hereby move to file under seal its Response to Valve Corporation's Motion to Lift Stay and Dismiss Case with Prejudice and certain confidential documents and information subject to the protective order entered in this action (ECF 23). In support of their motion, Plaintiffs state as follows:

IDENTIFICATION OF DOCUMENTS AND BRIEFING TO BE SEALED

1. Plaintiffs' Response in Opposition to Defendant Valve Corporation's Motion to Lift Stay and Dismiss Case with Prejudice ("Plaintiffs' Response") and Exhibits A through E attached thereto.

2. Exhibit A to Plaintiffs' Response is the Award of Arbitrator in AAA-01-18-0001-7979 (B.S., et al. v. Valve Corp.).

3. Exhibit B to Plaintiffs' Response is the Award of Arbitrator in AAA-01-18-0001-7977 (G.G. v. Valve Corp.).

4. Exhibit C to Plaintiffs' Response is the Transcript of 11/29/2018 Arbitration AAA 01-18-0001-7979 (B.S., et al. v. Valve Corp.);

5. Exhibit D to Plaintiffs' Response are Exhibits to Transcript of 11/29/2018 Arbitration AAA 01-18-0001-7979 (B.S., et al. v. Valve Corp.)

3. Exhibit E to Plaintiffs' Response is the Transcript of 12/13/2018 Arbitration AAA 01-18-0001-7977 (G.G., et al. v. Valve Corp.);

4. Exhibit F to Plaintiffs' Response are the Exhibits to Transcript of 12/13/2018 Arbitration AAA 01-18-0001-7977 (G.G., et al. v. Valve Corp.);

5. Exhibit G to Plaintiffs' Response are the arbitration pleadings in AAA 01-18-0001-7979 (B.S., et al. v. Valve Corp.) and AAA 01-18-0001-7977 (G.G., et al. v. Valve Corp.).

WHY SEALING IS NECESSARY

The parties have entered a stipulated protective order governing the exchange in discovery of documents deemed confidential (ECF#23). Plaintiffs seek to file the "Confidential" documents described above in support of their Response in Opposition to Defendant Valve Corporation's Motion to Lift Stay and Dismiss Case with Prejudice. Further, Plaintiffs quote from these Confidential documents in their written Response and. Therefore, filing both the Response and identified exhibits under seal is necessary to abide by the Protective Order. No alternatives are adequate because the

1 information, descriptions of information, or documents, are needed to adequately convey Plaintiff's
 2 argument, and filing this information publicly would violate this Court's order. Because Defendant
 3 Valve Corporation designated the documents confidential, and does not stipulate to this Motion, it
 4 must satisfy Local Civil Rule 5(g)(3)(B) in its response to this motion.

5 **LOCAL CIVIL RULE 5(g)(3)(A) CERTIFICATION**

6 Plaintiffs hereby certify that they have met and conferred with all other parties in an attempt
 7 to reach agreement on the need to file the documents under seal, to minimize the amount of material
 8 filed under seal, and to explore redaction and other alternatives to filing under seal. Specifically,
 9 Jasper D. Ward IV, counsel for Plaintiffs, conferred via email and telephonically with Gavin Skok,
 10 counsel for Defendant Valve Corporation, on February 11, 2019 in advance of this filing.

11 **DURATION OF TIME REQUESTED**

12 Plaintiffs request that the briefing and documents they seek to file under seal remain sealed
 13 unless and until they become publicly-available or de-designated as "Confidential" under the existing
 14 Protective Order or by any Order of this Court.

15 WHEREFORE, Plaintiffs request that this Court GRANT their Motion to File Under Seal and
 16 enter the attached tendered Proposed Order

17 Respectfully submitted this 19th day of February, 2019.

18 TOUSLEY BRAIN STEPHENS PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED at Seattle, Washington, this 19th day of February, 2019.

s/ Jason T. Dennett

Jason T. Dennett

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